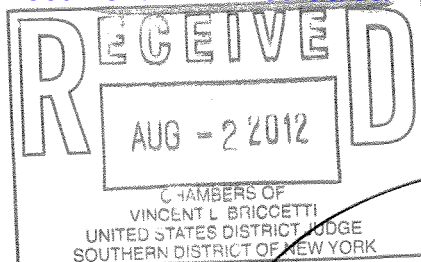


From: Jacob Teitelbaum
c/o Ben Friedman
5 Leipnik Way # 102,
Monroe N. Y. 10950



MEMO ENDORSED

To: The Honorable Vincent L. Briccetti
United States District Court Judge
Southern District of New York
300 Quarropas Street
White Plains, New York, 10601

APPLICATION GRANTED
SO ORDERED *WJL*
VINCENT L. BRICCETTI 8/3/12
U.S.D.J.

*Plaintiff's opposition to these
motions is due 9/28/12.
Defendants' Replies due
10/19/12.*

Re: Jacob Teitelbaum Vs. Juda Katz et al. 12-cv-2858 VB

Dear Judge Briccetti,

I am Jacob Teitelbaum, Plaintiff in this action. I was recently served with two motions for dismissal, with the following schedules; the first motion to dismiss, by Defendants Children's Rights Society and Atty. Kim Pavlovic, was filed on July 19th, likewise the second motion to dismiss, by Defendant Atty. Maria Petrizio Esq., was filed on July 20th, both motions are returnable on the same date by August 10th.

My opposition papers to both motions would have to be filed and served by August 6th, which includes the extra 3 days for service by mail. The Defendants remain accordingly with only a mere 4 days to file a reply, not including the 3 extra days added when I serve my papers by mail.

I received the first motion on Fri. July 20 (by mail), the second motion I received on Tue. July 24th (by mail), the pro-se manual of the southern district (entitled "making motions and opposing motions") specifies that the motion return date must be 27 days from the date of filing, this according to Rule 6.1 of the FRCP.

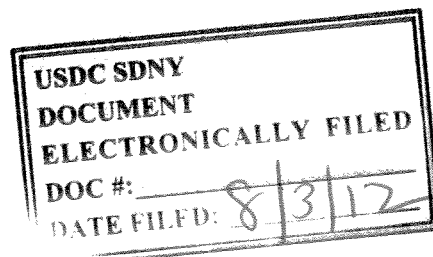
I sent a letter on July 24th, to counsel for both Defendants above, that I need time to file my response until the end of September 2012. Counsel for Defendant Atty. Maria Petrizio Esq. consented to my request, Counsel for Defendants Children's Rights Society and Atty. Kim Pavlovic offered to extend only until August 31st, 2012, and only with conditions, (copies of the correspondence between counsel and myself is attached herewith).

As it stands both motions contain large amounts of information, case law, and statutes, requiring me to properly study and become familiar with the many legal issues involved in the motions for dismissal. In order to be able to prepare and draft my opposition papers properly I would need a fair amount of time to prepare. Therefore I respectfully ask the Hon. Court to extend the time to file my opposition papers for both motions to dismiss until the end of September 2012.

Dated July 30, 2012, Monroe, NY.

Respectfully,

Jacob Teitelbaum, Plaintiff



CC;
TARSHIS, CATANIA, LIBERTH, -
MAHON & MILIGRAM, PLLC,
Rebecca Baldwin Montello, Esq.
Attorney for defendants,
Children's Rights Society, Inc.
And Atty. Kim Pavlovic
One Corwin Court, P.O. Box 1479
Newburgh, New York, 12550
T - 845-565-1100
F - 845-565-1999
E-mail; rmantello@tclmm.com

David Darwin, Esq.
Orange County Dept. of Law.
Municipal Law Division
15 Matthews Street, Suite 305
Goshen, New York, 10924
T - 845-291-3150
F - 845-291-3167
Email; ddarwin@orangecountygov.com

Garbarini & Scher P.C.
Gregg D. Weinstock, Esq.
Attorneys for defendant -
Maria A. Patrizio, Esq.
432 Park Avenue South, 9th Floor
New York, NY, 10016
T - 212-689-1113
Email; gweinstock@garbarini-scher.com

Taddeo & Shahn LLP
Karen M. Taddeo, Esq.
Attorneys for defendants
Kiryas Joel Comm Ambulance CRP
David Ruebstein
472 South Salina Street, Suite 700
Syracuse, New York, 13202
T 315-422-6666
ktaddeo@ts-law.com

Jacob Teitelbaum
c/o Ben Friedman
5 Leipnik Way # 102,
Monroe N. Y. 10950

GARBARINI & SCHER P.C.
Attn; Gregg D. Weinstock, Esq.
Attorneys for defendant –
Maria A. Patrizio, Esq.
432 Park Avenue South, 9th Floor
New York, NY, 10016
T – 212-689-1113
Email; gweinstock@garbarini-scher.com

Re: Jacob Teitelbaum Vs. Juda Katz et al. 12-cv-2858 VB

Tuesday, July 24, 2012

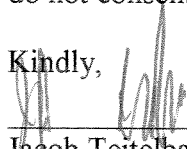
Dear Mr. Weinstock,

I am in receipt of your motion for dismissal filed on July 20th, which is returnable by August 10th.

In order to be able to study your statements, legal arguments, statutes and case law, and prepare my arguments, legal framework and answer accordingly, I would propose to file my answer by the end of September 2012, which would allow me more time to study and prepare my answer.

Please advise if you consent to my request, which I would then file with the Court to get the Court's approval. In the event I do not get an answer from you by July 29th, I will take it that you do not consent.

Kindly,



Jacob Teitelbaum, Plaintiff

GARBARINI & SCHER, P. C.

ATTORNEYS AT LAW

432 PARK AVENUE SOUTH
NEW YORK, N.Y. 10016-8013

(212) 689-1113

July 25, 2012

MYRNA A. LEVINSON
WILLIAM G. SCHER *⁰¹³
KURT LEE WEINMANN *
PAUL M. PALEY ⁰
GREGG D. WEINSTOCK *¹⁰
YUVAL D. BAR-KOKHBA
CHRISTINE E. FERNANDEZ
BILL GIANARIS
BARRY M. RUDERMAN
BARRY ROTHMAN ¹
ANDREW LONGO ⁰
PAMELA D. FIELD *⁰
RITA F. ARONOV *
ASHER I. LABENDZ *
MICHAEL D. DREWS
LAURA M. MULLANEY
BRIAN R. SIMEONE
NATHAN A. BRILL ⁴

WILLIAM D. BUCKLEY *¹
APPELLATE COUNSEL

ALSO ADMITTED IN
¹ NEW JERSEY
² CONNECTICUT
³ WASHINGTON, D.C.
⁰ FLORIDA
⁹ NORTH DAKOTA
^{*} MICHIGAN

VIA E-MAIL: s10950@gmail.com

and

FIRST CLASS MAIL

Mr. Jacob Teitelbaum
c/o Ben Friedman
5 Leipnik Way #102
Monroe, NY 10950

FACSIMILE: (212) 725-8630
legal@garbarini-scher.com

LONG ISLAND OFFICE
170 OLD COUNTRY ROAD, SUITE 600
MINEOLA, N.Y. 11501-4307
(516) 248-3012

WESTCHESTER OFFICE
202 MAMARONECK AVENUE, SUITE 500
WHITE PLAINS, N.Y. 10601-5312
(914) 949-7100

NEW JERSEY OFFICE
COURT PLAZA NORTH
25 MAIN STREET, SUITE 602
HACKENSACK, N.J. 07601-9007
(201) 343-2002

CONNECTICUT OFFICE
66 FIELD POINT ROAD
GREENWICH, CT 06830-6473
(203) 256-8932

CHAS. J. GARBARINI (1962-2001)
LEONARD WEINSTOCK (1967-2011)
GEORGE J. KEHAYAS (1977-2010)

EMERITUS
STANLEY J. SCHER

Re: *Teitelbaum v. Katz, et al.*
U.S.D.C., S.D.N.Y. Docket No. 12-CV-2858 (VB)
Our File No. 18419

Dear Mr. Teitelbaum:

We are writing in response to your letter of July 24, 2012 with respect to our Motion to Dismiss. We consent to your request for additional time, and suggest the following briefing schedule:

1. You would file and serve your opposition to our motion on or before September 28, 2012;
2. We would then serve our reply papers on or before October 19, 2012; and
3. We would then ask the Court to schedule oral argument at its convenience for a date after October 19, 2012.

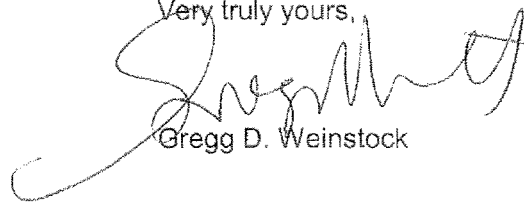
Please confirm that this proposed briefing schedule is acceptable, and then you can contact the court.

Mr. Jacob Teitelbaum

July 25, 2012

Page 2

Very truly yours,

A handwritten signature in black ink, appearing to read "Gregg D. Weinstock". The signature is fluid and cursive, with a long, sweeping underline that extends to the left.

Gregg D. Weinstock

GDW/mg

cc: Taddeo & Shahn, LLP
472 South Salina Street, Suite 700
Syracuse, NY 13202
Attn: Karen M. Taddeo, Esq.

Tarshis, Catania, Liberth, Mahon
& Milligram, PLLC
One Corwin Court
P.O. Box 1479
Newburgh, NY 12550
Attn: Rebecca Mantello, Esq.

Jacob Teitelbaum
c/o Ben Friedman
5 Leipnik Way # 102,
Monroe N. Y. 10950

GARBARINI & SCHER P.C.
Attn; Gregg D. Weinstock, Esq.
Attorneys for defendant –
Maria A. Patrizio, Esq.
432 Park Avenue South, 9th Floor
New York, NY, 10016
T – 212-689-1113
Email; gweinstock@garbarini-scher.com

Re: Jacob Teitelbaum Vs. Juda Katz et al. 12-cv-2858 VB

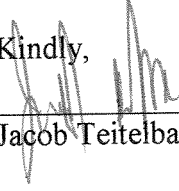
Monday, July 30, 2012

Dear Mr. Weinstock,

I received your letter dated July 24th Thanks for consenting to my request for more time to respond to your motion for dismissal.

Regarding your suggested schedule, I would be in a better position to consider your request in late September closer to the time I would need to file my answer.

Kindly,



Jacob Teitelbaum, Plaintiff

Jacob Teitelbaum
c/o Ben Friedman
5 Leipnik Way # 102,
Monroe N. Y. 10950

Attn; Rebecca Baldwin Montello, Esq.
Tarshis, Catania, Liberth, Mahon & Miligram, PLLC,
One Corwin Court, P.O. Box 1479
Newburgh, New York, 12550
T - 845-565-1100 / F - 845-565-1999
E-mail; rmantello@tclmm.com

Re: Jacob Teitelbaum Vs. Juda Katz et al. 12-cv-2858 VB

Tuesday, July 24, 2012

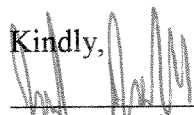
Dear Ms. Montello,

I am in receipt of your motion for dismissal filed on July 19th, which is returnable by August 10th.

In order to be able to study your statements, legal arguments, statues and case law, and prepare my arguments, legal framework and answer accordingly, I would propose to file my answer by the end of September 2012, which would allow me more time to study and prepare my answer.

Please advise if you consent to my request, which I would then file with the Court to get the Court's approval. In the event I do not get an answer form you by July 29th, I will take it that you do not consent.

Kindly,



Jacob Teitelbaum, Plaintiff

TARSHIS, CATANIA, LIBERTH, MAHON & MILLIGRAM, PLLC

ATTORNEYS AND COUNSELLORS AT LAW

JOSEPH A. CATANIA, JR.
RICHARD F. LIBERTH
RICHARD M. MAHON, II (DC, AZ)
STEVEN I. MILLIGRAM (NJ)
MICHELLE F. RIDER, CPA (FL)
PAUL S. ERNENWEIN
HOBART J. SIMPSON
JULIA C. GOINGS-PERROT

SPECIAL COUNSEL
STEVEN L. TARSHIS, LLM TAXATION
JAY F. JASON (MA)
JOSEPH G. MCKAY

ONE CORWIN COURT
POST OFFICE BOX 1479
NEWBURGH, NEW YORK 12550
(845) 565-1100
1-800-344-5655
FAX (845) 565-1999
(FAX SERVICE NOT ACCEPTED)

100 RED SCHOOLHOUSE ROAD, SUITE C-12
CHESTNUT RIDGE, NEW YORK 10977
TEL (845) 426-7799 FAX (845) 426-5541
(MAIL AND FAX SERVICE NOT ACCEPTED)

E-MAIL: tclmm@tclmm.com
www.TCLMM.com

MARK L. SCHUH
DANIEL F. SULLIVAN
MICHAEL E. CATANIA (NJ, CT, MA)
ARYEH LAZARUS (NJ)
HOLLY L. REINHARDT (NJ)
REBECCA BALDWIN MANTELLO (CT)
ARI I. BAUER
DEBRA M. BURG
LIA E. MULLIGAN (MA)
STEVEN L. GRASSO
ERIC D. OSSENIUK (NJ)
SARITA BHANDARKAR, LLM TAXATION
SEAMUS P. WEIR

(ALSO ADMITTED IN)

Writer's Direct No.
(845) 569-4318

(ALSO ADMITTED IN)

Writer's E-Mail
rmantello@tclmm.com

July 25, 2012

Jacob Teitelbaum
c/o Ben Friedman
5 Leipnik Way #102
Monroe, New York 10950

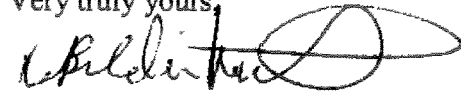
RE: Jacob Teitelbaum v Juda Katz et al
Case No.: 12-CV-2858
Our File No.: 12951-60692

Dear Mr. Teitelbaum:

Our office is in receipt of your letter dated July 24, 2012 requesting an extension of time to respond to the motion to dismiss filed on behalf of our clients, the Children's Rights Society and Kim Pavlovic.

We can extend your time to respond to the motion until August 31, 2012. In addition, we would extend our time to reply to your opposition until September 14, 2012. An extension of time must be so ordered by the Court. If this is agreeable to you, please advise me of your acceptance of this extension of time as soon as possible so that I may write a letter to the Court for Judge Briccetti's approval.

Very truly yours,



REBECCA BALDWIN MANTELLO

RBM/rbm/762258

Cc via email:

David Darwin, Esq. at ddarwin@orangecountygov.com
Gregg Weinstock, Esq. at gweinstock@garbarini-scher.com
Karen M. Taddeo, Esq. at ktaddeo@ts-law.com